

January 20, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325

Attn: Wireless Telecommunications Bureau

Re: Reply Comments WT Docket 09-217

Dear Ms. Dortch:

Fairfax County, a member of the Metropolitan Washington Council of Governments (COG) recognizes the importance of interoperability and how to achieve our communications goals through regional cooperation and planning. The Regional Emergency Coordination Plan (RECP) is a collaboration of planning, communication, information sharing, and coordination activities before, during, or after a regional emergency for the nineteen Metropolitan Washington Council of Governments (COG) member governments, the State of Maryland, the Commonwealth of Virginia, the Federal government, the public agencies, the private sector and volunteer organizations, and local schools and universities.

This same level of cooperation and planning should be applied to alerting and recall as it is to other communications capabilities. The first step in this effort should be to allow us to use current technologies, which include two-way paging. A well thought out plan in-line with spectrum policy is the only way to foster long term interoperability and ensure we provide the highest level support necessary to our first responder community. We view this as a local issue,

since our close proximity to the border of the one unlicensed NPSC channel makes it difficult for us to construct a two-way paging system. But even if we are ultimately able to make use of this channel by waiver of rule, regional interoperability issues arise because the vast majority of RECP members would have no such option. It does not take much imagination to extrapolate these problems to the national level, where we can clearly see the national issues raised by the NPSTC Petition for Rulemaking. Public safety needs a plan for these systems, beginning with a well-defined set of channels that we all program into our pagers to allow for seamless roaming among networks. The NPSTC request for 5 channels is a reasonable first step in this process.

Also, in our opinion, allowing access to these channels by public safety will not adversely harm the commercial two-way paging industry as some have suggested. 5 channels represents the tiniest fraction of spectrum in this band and a very small cash value given the most recent set of auctions for this type of spectrum. Customers will not migrate away from commercial two-way paging carriers onto public safety systems, simply because there are not significant public safety users utilizing commercial two-way paging networks to begin with. It is simply not an option for first responders to carry commercial pagers for alerting and recall¹, any more than it is an option for them to carry cell phones into tactical situations in lieu of P25 radios. Contrary to carriers' assertions, we believe that public safety's increased adoption of two-way paging will benefit the beleaguered two-way paging carriers. Increased use of two-way paging technology will open up new revenue streams for carriers by allowing public/private partnerships which are simply not possible with older 1-way paging systems. This migration will also get public safety

and commercial carriers all onto the same technological platform, which will expand the overall market for two-way paging equipment and attract new vendors.

Please take the NPSTC request at face value. It is an effort to give public safety, one of the largest consumers of paging equipment, access to current technology and a framework for these systems to interoperate. It is not an attempt to harm commercial carriers and we do not believe it will have that affect. Please grant the NPSTC request and help public safety improve our first responder alerting capabilities.

Sincerely


James Wadsworth
Communications Manager
Fairfax County

¹ NFPA-1221, 2002 edition, at 1221-23 section 8.4.2.1